

EXHIBIT B

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICROBOT MEDICAL INC.

Civil Action No.:19-CV-3782 (GBD)

Plaintiff,

v.

ECF Case

ALLIANCE INVESTMENT MANAGEMENT LTD.,

Defendant.

DEFENDANT'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a), Defendant Alliance Investment Management Ltd. (“Alliance” or “Defendant”) hereby provide Initial Disclosures to Plaintiff as follows:

- A. Individuals who may have discoverable information relevant to the disputed facts alleged in the Amended Complaint:
 - 1. **Peter D. Chin (who may be contacted via the undersigned counsel)**
 - 2. **Dania Thompson (who may be contacted via the undersigned counsel)**
 - 3. **Joseph Mona (who may be contacted via the undersigned counsel)**
- B. Documents to be used to support Alliance’s defense: **SEC correspondence previously disclosed as exhibits to Alliance’s Answer to the Amended Complaint in the above action.**
- C. A computation of each category of damages claimed by the disclosing party: **Not applicable.**
- D. Any insurance agreement under which an insurance business may be liable to

satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment: **Not applicable.**

Dated: New York, New York
September 9, 2019

FORD O'BRIEN LLP

By:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICROBOT MEDICAL INC.

Civil Action No.:19-CV-3782 (GBD)

Plaintiff,

v.

ALLIANCE INVESTMENT MANAGEMENT LTD.,

Defendant.

ALLIANCE INVESTMENT MANAGEMENT LTD.'S RESPONSE TO MICROBOT MEDICAL INC.'S FIRST SET OF INTERROGATORIES

Alliance Investment Management Ltd. hereby objects and responds to Microbot Medical Inc.'s First Set of Interrogatories, dated August 9, 2019, subject to Alliance's ongoing objection to this discovery request on the basis that Alliance is not the beneficial owner of the Microbot securities at issue in this matter and thus not a proper defendant.

RESPONSES TO INTERROGATORIES

Interrogatory No. 1

Identify all persons with knowledge of the investment, trading, or voting of Microbot securities, as reported on the Schedule 13D you filed with the SEC on or around July 2, 2018, including any investment in, or trading or voting of Microbot securities in any Managed Account or on behalf of any Alliance client.

Response to Interrogatory No. 1

Alliance Investment Management Ltd. objects to Request No. 1 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that Peter Chin and Dania Thompson are the individuals with knowledge of the SEC filings at issue.

Interrogatory No. 2

Identify all persons with knowledge of the Microbot securities transactions reported on the SEC Form 3 and SEC Form 4 filed by you on or around January 16, 2019, including any transactions executed in any Managed Account, or on behalf of any Managed Account owner or Alliance client.

Response to Interrogatory No. 2

Alliance Investment Management Ltd. objects to Request No. 2 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that Peter Chin and Dania Thompson are the individuals with knowledge of the SEC filings at issue.

Interrogatory No. 3

Identify all persons with knowledge of your communications with Microbot, or between or among Alliance employees, principals, agents, affiliates, Managed Account owners or clients, relating or referring to investing in Microbot, or holding, voting, or trading Microbot securities.

Response to Interrogatory No. 3

Alliance Investment Management Ltd. objects to Request No. 3 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that there are no individuals at Alliance with knowledge of the information sought by Interrogatory 3.

Interrogatory No. 4

Identify all persons with knowledge of any profits realized under Section 16(b) of the Securities Exchange Act of 1934 or otherwise, by Alliance, in any Managed Account, or on behalf of any Alliance client or affiliate, from the trading of Microbot securities.

Response to Interrogatory No. 4

Alliance Investment Management Ltd. objects to Request No. 4 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that there are no individuals at Alliance with knowledge of the information sought by Interrogatory 4.

Interrogatory No. 5

Identify all persons with knowledge of arrangements or agreements governing or pertaining to Alliance's trading of Microbot securities in any Managed Account, including any agreements relating to management fees, compensation, or any other form of payment for Alliance's trading of Microbot securities in any Managed Account.

Response to Interrogatory No. 5

Alliance Investment Management Ltd. objects to Request No. 5 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that there are no individuals at Alliance with knowledge of the information sought by Interrogatory 5 because Alliance conducted no such trading in any managed accounts.

Interrogatory No. 6

Identify all Managed Accounts that held, traded, or voted Microbot securities (including at Alliance's direction); and identify the owners of any such Managed Accounts or Microbot securities; and all persons with knowledge of the ownership of such Managed Accounts or Microbot securities.

Response to Interrogatory No. 6

Alliance Investment Management Ltd. objects to Request No. 6 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that there are no such managed accounts.

Interrogatory No. 7

Identify any agreement, arrangement or understanding, either express or implied, between or among Alliance and any Alliance client or Managed Account owner to act together for the purpose of acquiring, holding, voting, or disposing of Microbot securities; and all persons with knowledge of any such agreements, arrangements, or understandings.

Response to Interrogatory No. 7

Alliance Investment Management Ltd. objects to Request No. 7 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that there are no such agreements.

Interrogatory No. 8

Identify all persons with knowledge of any affiliation or relationship between Alliance and any

Alliance client on behalf of which Microbot securities were held, voted, or traded by Alliance, or with the owner of any Managed Account in which Microbot securities were held, voted, or traded (including all persons with knowledge of Alliance's role as limited partner, general partner, manager, employee, advisor, or agent of any Alliance client or Managed Account owner, or any direct or indirect relationship between or among Alliance and the Alliance client or Managed Account owner).

Response to Interrogatory No. 8

Alliance Investment Management Ltd. objects to Request No. 8 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that Peter Chin and Dania Thompson are the individuals with knowledge of all client relationships.

Interrogatory No. 9

Identify all persons with knowledge of any Alliance client's or Managed Account owner's exercise of, or right to exercise, voting or investment control over Microbot securities held by Alliance, or by any other Alliance client or Managed Account owner.

Response to Interrogatory No. 9

Alliance Investment Management Ltd. objects to Request No. 9 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Subject to and notwithstanding this objection, Alliance responds that Peter Chin and Dania Thompson are the individuals with knowledge of all client relationships.

Interrogatory No. 10

Identify all persons with knowledge of Alliance's compliance with, liability under, or exemption

from, Section 16 and/or Section 13 of the Securities Exchange Act of 1934.

Response to Interrogatory No. 10

Alliance Investment Management Ltd. objects to Request No. 10 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona. Moreover, Interrogatory No. 10 poses legal questions which are improper.

Subject to and notwithstanding this objection, Alliance responds that Peter Chin and Dania Thompson are the individuals with knowledge of all relevant SEC reports made by Alliance.

Interrogatory No. 11

Identify any persons affiliated with Alliance, or any Alliance client or Managed Account owner, that had or shared voting or investment control over, or had or shared a pecuniary interest in, Microbot securities managed, held, or traded by Alliance or in any Managed Account.

Response to Interrogatory No. 11

Alliance Investment Management Ltd. objects to Request No. 11 on the ground that as it is not now and never has been the beneficial owner of the Microbot Medical Inc. securities at issue in this case and that, having corrected its SEC filings, Alliance is no longer the proper recipient of any discovery in this action as the action relates solely to trading conducted by a non-party, Joseph Mona.

Interrogatory No. 12

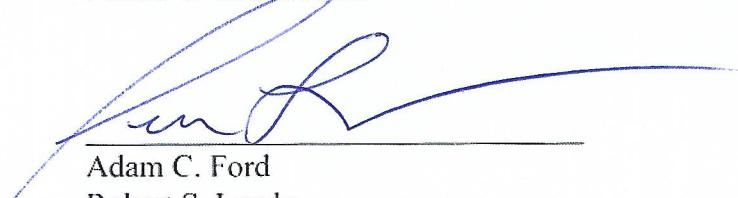
Identify all persons with knowledge of any policies implemented by Alliance regarding the solicitation (or non-solicitation) of U.S. customers and/or compliance requirements applicable to broker/dealers for U.S. customers.

Response to Interrogatory No. 12

Alliance Investment Management Ltd. objects to Request No. 12 on the ground that it is beyond the permissible scope of discovery and seeks information solely for the purpose of harassment.

Dated: New York, New York
September 9, 2019

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Attorney for Defendants Alliance Investment Management Ltd.

VERIFICATION

I, Peter Chin, Chief Executive Officer of Defendant Alliance Investment Management Ltd., declare under penalty of perjury under the laws of the United States of America and pursuant to 29 USC § 1746(2), that the facts set forth in Defendant's Objections And Responses To Plaintiffs' First Set of Interrogatories are true and accurate based on the information available to me.

Dated: September 9, 2019
Kingston, Jamaica



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MICROBOT MEDICAL INC.

Plaintiff,
v.

ALLIANCE INVESTMENT MANAGEMENT LTD.,

Defendant.

Civil Action No.:19-CV-3782 (GBD)

Defendant's Response to Plaintiff's First Set of Document Requests

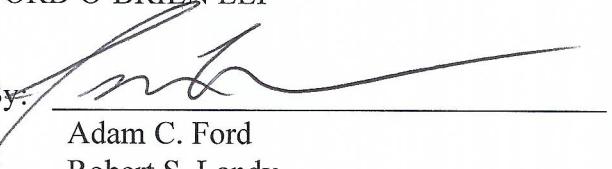
Alliance Investment Management Ltd. objects to each and every document request in its entirety on the following grounds:

Alliance Investment Management Ltd. is not the proper defendant in this case because it is merely a broker, and not the beneficial owner of any shares in plaintiff Microbot Medical, Inc. While it filed certain SEC forms that indicate to the contrary, those forms were filed in error. On August 5, 2019, the undersigned counsel informed Microbot's counsel of the same, and indicated their intention to correct the SEC record. During that call, Alliance disclosed the identity of the beneficial owner, one of its clients, and informed Microbot's counsel that the undersigned firm would also represent the beneficial owner. In Court and on the record then following day, Alliance's again explained that the SEC forms had been filed in error and would be corrected. On August 16, 2016 Alliance answered the Amended Complaint in the above action, attaching copies of its submissions to the SEC requesting removal of the incorrect filing. Finally, simultaneously herewith, subject to its continuing objections, Alliance responded to Microbot's interrogatories with a verified response that again discloses the identity of the beneficial owner of the Mircorbot stock at issue in this case.

While Mircorbot may have a claim against Joseph Mona (Alliance's client and the beneficial owner), it has no claim against Alliance, a foreign broker that is not the correct defendant. Alliance never had voting control nor a pecuniary interest in the shares at issue. Having disclosed the identity of the beneficial owner and having corrected its SEC filings, any further use of the Court's jurisdiction to obtain material that could only be relevant to a future/contemplated lawsuit against an individual that is not a party hereto is improper.

Dated: New York, New York
September 9, 2019

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